



June 17, 2013

Stanley Meiburg
Acting Regional Administrator
USEPA Region 4
61 Forsyth Street, S.W.
Mail Code: 9T25
Atlanta, GA 30303-8960

Re: Follow up on EZ-Base

Dear Acting Administrator Meiburg:

We are writing to follow up on our original letter dated March 29, 2013 (Attachment I) with regard to our request for the immediate testing of EZBase, a material made from coal combustion waste distributed by Jacksonville Electric Authority. This hazardous substance is currently being used in Florida and Georgia as fill material and road base.

We have not received a response from your office to our letter, despite the time-sensitive nature of our request. In addition, since our March request, our concern has increased as new complaints and discoveries have surfaced.

On March 20, 2013 Earthjustice took samples from a path near J.L. Wilkinson Elementary School in Clay County after reports that EZBase was applied to an adjacent road. The sample results revealed high levels of vanadium and arsenic above the state and federal standards deemed safe for residential soils in Middleburg, Florida (Attachment II).

On March 28, 2013, Clean Water Action received an unsolicited call from Scott Allen, a Middleburg, Florida homeowner. Mr. Allen discovered EZBase being applied to a road at Camp Blanding behind his home and extending behind a large residential community. While EZBase was approved for use at the Camp Blanding site, dust and runoff from applications of EZBase entered Mr. Allen's property. Mr. Allen filed a complaint and received a response from DEP (Attachment III). The EZBase site directly behind Mr. Allen's property is an ongoing problem and is still being addressed. Additionally, we share Mr. Allen's concern that his neighbors are unaware that EZBase was applied near their homes. The uncovered application of EZBase has the potential to leach hazardous contaminants into the groundwater and impact water quality of residential drinking wells.

As you may know, on May 30, 2013, Florida Governor Rick Scott signed into law the Fossil Fuel Combustion Products Act, which provides industry with unbridled use of coal ash byproducts like EZBase. For use as structural fill and pavement aggregate, DEP must be notified where, when, and what type of combustion waste is used, but reporting of the quantity applied is

not required. Clearly, the law has major flaws. Not only does it leave a wide scope of coal ash reuse applications that is too broad without providing for necessary state oversight and review, it also does not require the use of any modern testing protocols like Leaching Environmental Assessment Framework (LEAF). We would be more than happy to provide extensive details on the law's deficiencies.

We ask that you address our concerns in the following ways:

1. Conduct LEAF and chemical constituent testing of EZBase used in road and fill applications.
2. Assign staff to participate in a phone or in-person meeting with national health and environmental organizations working in Florida on coal ash issues.
3. If LEAF or contaminant testing results confirms that EZBase leaches toxicants to the environment or contains hazardous materials at levels that create a health risk from inhalation or direct contact, we request testing of key application sites (Attachment IV).

Please send an e-mail confirmation receipt of this correspondence to Lisa Evans at levans@earthjustice and Angelique Giraud at agiraud@cleanwater.org and indicate the next step to move this issue to fruition.

We thank you in advance for your prompt attention to this matter, and we look forward to your timely response.

Respectfully,



Kathleen E. Aterno
Florida Director
Clean Water Action



Lisa Evans
Senior Administrative Counsel
Earthjustice

cc: Assistant Administrator Mathy Stanislaus, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response
Suzanne Rudzinski, U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response
Secretary Herschel T. Vinyard, Jr., Florida Department of Environmental Protection
Major General Emmett R. Titshaw, Jr., Florida National Guard
Brigadier General Richard Gallant, Florida National Guard
Forest Area Supervisor, Paul Catlett, Florida Forest Service

**Clean Water Action * Earthjustice * Physicians for Social Responsibility
Southern Alliance for Clean Energy * St. Johns Riverkeeper
Waterkeeper Alliance**

By Email: Keyesfleming.gwendolyn@Epa.gov

March 29, 2013

Gwen Keyes-Fleming
Regional Administrator
USEPA Region 4
61 Forsyth Street, S.W.
Mail Code: 9T25
Atlanta, GA 30303-8960

Re: Request to conduct Leaching Environmental Assessment Framework (LEAF) on EZBase

Dear Regional Administrator Keyes-Fleming:

The undersigned public health and environmental groups write to request the immediate testing of EZBase, a hazardous substance currently used in Florida and Georgia as fill material and road base. EZBase is produced by the Jacksonville Electric Authority (JEA) from fly ash and bottom ash generated from the combustion of coal. Although the waste is promoted as clean fill, there is evidence that EZBase can leach harmful chemicals to the environment. Consequently, the widespread use of EZBase near residential areas, schools, camps and water sources may pose significant health and environmental hazards in many locations throughout Florida and Georgia.

Over the last decade, however, large amounts of EZBase have been used as fill and road base on numerous locations in Georgia and Florida. Reportedly, during the 12 months from 2011 to 2012, JEA told the Florida Department of Environmental Protection it distributed about 232,000 tons in Florida, including over 40,000 tons at Camp Blanding. In 2010, the St. Johns River Water Management District used EZBase as fill in wetlands there.

Use of EZBase in or near wetlands, however, has caused documented contamination in northeast Florida. For example, JEA offered 16,000 tons of EZBase free of charge to Clay County, Florida homeowner Steve Johnson to use as road base around his residential property on Blackwater Creek on the condition that the property would be available for use as a model site to demonstrate the use of EZBase.

After application of EZBase on every road on his 30 acres of land, Mr. Johnson was visited by the Florida Department of Environmental Protection (FDEP). FDEP ordered removal of the EZBase due to its high levels of toxic contaminants and its placement on Blackwater Creek, a

protected wetland system that connects to a major drinking water source. JEA was ordered to remove only the EZBase immediately adjacent to the wetlands, but left the majority of the toxic substance for Mr. Johnson to remove on his own or keep on the property and live with the impacts. Mr. Johnson later sent samples of EZBase from his property to a certified lab, where levels of arsenic, chromium, mercury, and vanadium were detected above the state and federal maximum contaminant levels.

Yet, despite the threat of contamination from the placement of EZBase, this material has never been appropriately tested. To date, the waste has been tested with the Toxicity Characteristic Leaching Procedure (TCLP), which the US EPA has determined is not an accurate leach test for coal combustion waste. In this situation, where coal combustion waste is used “beneficially” in areas that are accessible to the public and near water resources, the precedent is for EPA to test the material using the best available science, which is the newly approved Leaching Environmental Assessment Framework (LEAF).

In fact, last year investigators from EPA Region 2 tested a similar coal combustion waste “product” called “Agremax,” which, like EZBase, is used as fill and road base throughout Puerto Rico. EPA used the LEAF test to determine the extent to which Agremax could leach toxic heavy metals and other hazardous substances into the environment.

EPA’s LEAF test revealed that that numerous hazardous substances, including arsenic, boron, cadmium, chloride, chromium, fluoride, lead, lithium, molybdenum, selenium, sulfate, and thallium can leach from the waste at high levels and contaminate the local environment. Levels of arsenic, chloride, chromium and molybdenum in the leachate were particularly high. In fact, the LEAF test demonstrated that harmful chemicals, including heavy metals, are likely to leach from Agremax into groundwater and other water bodies at levels that far exceed current health-based standards for drinking water. A copy of EPA’s report is attached to this letter as Attachment 1.

Thus it is critical for EPA Region 4 to test EZBase to determine whether it presents a similar threat to health and the environment. We request that such testing occur immediately in light of the many areas where the waste has already been placed in Florida and Georgia and the many proposals for placement at additional sites in both states. We have attached a list of the sites where EZBase has been deposited, but this list does not in any way represent complete accounting. (Attachment 2)

If you or your staff would like to discuss this request in more detail, please contact Lisa Evans, Senior Administrative Counsel, Earthjustice, (781) 631-4119, levans@earthjustice.org and Angelique Giraud, Energy Community Organizer, Clean Water Action, (561) 672-7638, agiraud@cleanwater.org.

We thank you in advance for your prompt attention to this matter, and we look forward to your response.

Respectfully,

Kathleen E. Aterno
Florida Director
Clean Water Action

Lisa Evans
Senior Administrative Counsel
Earthjustice

Lynn Ringenberg, MD
Emeritus Professor Pediatrics
University of South Florida
President
Physicians for Social Responsibility of Florida

Ulla Reeves
High Risk Energy Program Director
Southern Alliance for Clean Energy

Lisa Rinaman
Riverkeeper
St. Johns Riverkeeper

Marc A. Yaggi
Executive Director
Waterkeeper Alliance

cc: Deputy Regional Administrator Stanley Meiburg, U.S. Environmental Protection Agency
Region 4
Assistant Administrator Mathy Stanislaus, U.S. Environmental Protection Agency, Office of
Solid Waste and Emergency Response
Suzanne Rudzinski, U.S. Environmental Protection Agency, Office of Solid Waste and
Emergency Response
Secretary Herschel T. Vinyard, Jr., Florida Department of Environmental Protection
Major General Emmett R. Titshaw, Jr., Florida National Guard

Pace Analytical e-Report

Report prepared for:

EARTHJUSTICE
21 OCEAN AVE
MARBLEHEAD, MA 01945
CONTACT: LISA EVANS

Project ID: EARTHJUSTICE FL ASH

Sampling Date(s): March 20, 2013

Lab Report ID: 13030305

Client Service Contact: Kelly Miller (518) 346-4592 ext. 23

Analysis Included:

Mercury Analysis
Metals by ICP (Custom)
Metals by ICP (RCRA-6010B)

Test results meet all National Environmental Laboratory Accreditation Conference (NELAC) requirements unless noted in the case narrative. The results contained within this document relate only to the samples included in this report. Pace Analytical is responsible only for the certified testing and is not directly responsible for the integrity of the sample before laboratory receipt. This report shall not be reproduced, except in full, without the written consent of Pace Analytical Services, Inc.



Dan Pfalzer
Laboratory Director



Certifications: NYS (EPA: NY00906, ELAP: 11078), NJ (NY026), CT (PH-0337), MA(M-NY906), VA (1884)

Pace Analytical Services, Inc. | 2190 Technology Drive | Schenectady, NY 12308
Phone: 518.346.4592 | internet: www.pacelabs.com

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CASE NARRATIVE

April 08, 2013

CASE NARRATIVE

This data package (SDG ID: 13030305) consists of 2 solid samples received on 03/25/2013. The samples are from Project Name: EARTHJUSTICE FL ASH.

This sample delivery group consists of the following samples:

<u>Lab Sample ID</u>	<u>Client ID</u>	<u>Collection Date</u>
AQ04235	EARTHJUSTICE FL ASH 12:56	03/20/2013 12:56
AQ04236	EARTHJUSTICE FL ASH 12:58	03/20/2013 12:58

Sample Delivery and Receipt Conditions

- (1.) All samples were delivered to the laboratory via USPS delivery service on 03/25/2013.
- (2.) All samples were received at the laboratory intact and within holding times.
- (3.) The following sample temperature was recorded at sample receipt (Control limits are between 0-6 Degrees Celsius): 21.5 (IR) degrees Celsius. Please see Chain of Custody for details. Control limits do not apply for metals analysis.

Mercury Analysis

Analysis for mercury was performed by method SW-846 7471A. The following technical and administrative items were noted for the analysis:

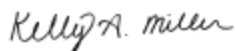
- (1.) All quality assurance parameters were met for the analysis.

Metals Analysis by ICP

Analysis for metals was performed by method SW-846 6010B. The following technical and administrative items were noted for the analysis:

- (1.) All quality assurance parameters were met for the analysis.

Respectfully submitted,



Kelly A. Miller
Project Manager

QUALIFIERS

Organic Laboratory Qualifiers Defined

B - Denotes analyte observed in associated method blank or extraction blank. Analyte concentration should be considered as estimated.

D - Surrogate was diluted out. The analysis of the sample required a dilution such that the surrogate concentration was diluted below the laboratory acceptance criteria.

E - Denotes analyte concentration exceeded calibration range of instrument. Sample could not be re-analyzed at secondary dilution due to insufficient sample amount, quick turn-around request, sample matrix interference or hold time excursion. Concentration result should be considered as estimated.

J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the Reporting Limit (RL).

P - Indicates relative percent difference (RPD) between primary and secondary GC column analysis exceeds 40 % or indicates percent difference (PD) between primary and secondary GC column analysis exceeds 25 %.

U - Denotes analyte not detected at concentration greater than or equal to the RL. RL's are adjusted for sample weight/volume and dilution factors.

Z - Chromatographic interference due to PCB co-elution.

* - Value not within control limits.

Inorganic Laboratory Qualifiers Defined

B - Denotes analyte observed in associated method blank or digestion blank. Analyte concentration should be considered as estimated.

E - Denotes analyte concentration exceeded calibration range of instrument. Sample could not be re-analyzed at secondary dilution due to insufficient sample amount, quick turn-around request, sample matrix interference or hold time excursion. Concentration result should be considered as estimated.

J - Denotes an estimated concentration. The concentration result is greater than or equal to the Method Detection Limit (MDL) but less than the Reporting Limit (RL).

U - Denotes analyte not detected at concentration greater than or equal to the RL. RL's are adjusted for sample weight/volume and dilution factors.

* - Value not within control limits.

SAMPLE CHAIN OF CUSTODY

Mercury



Analytical Sample Results

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56
Lab Sample ID: 13030305-01 (AQ04235)

Collection Date: 03/20/2013 12:56
Sample Matrix: SOLID
Received Date: 03/25/2013 10:00
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	MER1-1270-32	SW-846 7471A	04/02/2013 14:41	CJH	NA	NA	NA
Prep 1:	3586	EPA 7471A	04/01/2013 13:59	CJH	0.391 g	40.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Mercury	7439-97-6	ND	0.0205	1.00	U	MER1-1270-32

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

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Analytical Sample Results

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:58
Lab Sample ID: 13030305-02 (AQ04236)

Collection Date: 03/20/2013 12:58
Sample Matrix: SOLID
Received Date: 03/25/2013 10:00
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	MER1-1270-33	SW-846 7471A	04/02/2013 14:43	CJH	NA	NA	NA
Prep 1:	3586	EPA 7471A	04/01/2013 14:04	CJH	0.402 g	40.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Mercury	7439-97-6	ND	0.0199	1.00	U	MER1-1270-33

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

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Metals - ICP



Analytical Sample Results

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56
Lab Sample ID: 13030305-01 (AQ04235)

Collection Date: 03/20/2013 12:56
Sample Matrix: SOLID
Received Date: 03/25/2013 10:00
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-56	SW-846 6010B	04/04/2013 15:52	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:00	CJH	0.494 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Antimony	7440-36-0	ND	0.506	1.00	U	ICP2-635-56
Molybdenum	7439-98-7	8.80	0.506	1.00		ICP2-635-56
Vanadium	7440-62-2	485	0.506	1.00		ICP2-635-56

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

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Analytical Sample Results

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56
Lab Sample ID: 13030305-01 (AQ04235)

Collection Date: 03/20/2013 12:56
Sample Matrix: SOLID
Received Date: 03/25/2013 10:00
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-56	SW-846 6010B	04/04/2013 15:52	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:00	CJH	0.494 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Arsenic	7440-38-2	0.853	0.506	1.00		ICP2-635-56
Barium	7440-39-3	15.1	0.506	1.00		ICP2-635-56
Cadmium	7440-43-9	ND	0.405	1.00	U	ICP2-635-56
Chromium	7440-47-3	4.93	0.506	1.00		ICP2-635-56
Lead	7439-92-1	1.58	0.506	1.00		ICP2-635-56
Selenium	7782-49-2	ND	1.01	1.00	U	ICP2-635-56
Silver	7440-22-4	ND	0.709	1.00	U	ICP2-635-56

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Analytical Sample Results

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:58
Lab Sample ID: 13030305-02 (AQ04236)

Collection Date: 03/20/2013 12:58
Sample Matrix: SOLID
Received Date: 03/25/2013 10:00
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-61	SW-846 6010B	04/04/2013 16:03	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:03	CJH	0.506 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Antimony	7440-36-0	ND	0.494	1.00	U	ICP2-635-61
Molybdenum	7439-98-7	1.03	0.494	1.00		ICP2-635-61
Vanadium	7440-62-2	166	0.494	1.00		ICP2-635-61

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Analytical Sample Results

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:58
Lab Sample ID: 13030305-02 (AQ04236)

Collection Date: 03/20/2013 12:58
Sample Matrix: SOLID
Received Date: 03/25/2013 10:00
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-61	SW-846 6010B	04/04/2013 16:03	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:03	CJH	0.506 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Arsenic	7440-38-2	ND	0.494	1.00	U	ICP2-635-61
Barium	7440-39-3	6.63	0.494	1.00		ICP2-635-61
Cadmium	7440-43-9	ND	0.395	1.00	U	ICP2-635-61
Chromium	7440-47-3	2.71	0.494	1.00		ICP2-635-61
Lead	7439-92-1	1.28	0.494	1.00		ICP2-635-61
Selenium	7782-49-2	ND	0.988	1.00	U	ICP2-635-61
Silver	7440-22-4	ND	0.691	1.00	U	ICP2-635-61

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Quality Control Samples (Field)



Quality Control Results
Matrix Spike Sample
Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:58 MS
Lab Sample ID: 13030305-02M (AQ04236M)

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	MER1-1270-35	SW-846 7471A	04/02/2013 14:46	CJH	NA	NA	NA
Prep 1:	3586	EPA 7471A	04/01/2013 14:06	CJH	0.396 g	40.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Mercury	7439-97-6	0.511	0.0202	1.00		MER1-1270-35

Analyte Spiked	CAS No.	Sample (mg/kg)	Added (mg/kg)	MS (mg/kg)	MS % Rec.	Q ¹	Limits (%)
Mercury	7439-97-6		0.506	0.511	101		75.0-125

¹Qualifier column where '**' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results
Duplicate Sample
Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:58 DUP
Lab Sample ID: 13030305-02D (AQ04236D)

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	MER1-1270-34	SW-846 7471A	04/02/2013 14:45	CJH	NA	NA	NA
Prep 1:	3586	EPA 7471A	04/01/2013 14:05	CJH	0.399 g	40.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Mercury	7439-97-6	ND	0.0200	1.00	U	MER1-1270-34

Analyte	CAS No.	Duplicate (mg/kg)	Precision		
			Sample (mg/kg)	RPD	Limits (%)
Mercury	7439-97-6	ND	ND		20

¹Qualifier column where '*' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



**Quality Control Results
Matrix Spike Sample**

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56 MS
Lab Sample ID: 13030305-01M (AQ04235M)

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-58	SW-846 6010B	04/04/2013 15:57	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:02	CJH	0.494 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Antimony	7440-36-0	93.0	0.506	1.00		ICP2-635-58
Molybdenum	7439-98-7	111	0.506	1.00		ICP2-635-58
Vanadium	7440-62-2	581	0.506	1.00		ICP2-635-58

Analyte Spiked	CAS No.	Sample (mg/kg)	Added (mg/kg)	MS (mg/kg)	MS % Rec.	Q ¹	Limits (%)
Antimony	7440-36-0		101	93.0	91.9		75.0-125
Molybdenum	7439-98-7	8.80	101	111	101		75.0-125
Vanadium	7440-62-2	485	101	581	94.9		75.0-125

¹Qualifier column where '*' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



**Quality Control Results
Matrix Spike Sample**

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56 MS
Lab Sample ID: 13030305-01M (AQ04235M)

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-58	SW-846 6010B	04/04/2013 15:57	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:02	CJH	0.494 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Arsenic	7440-38-2	96.5	0.506	1.00		ICP2-635-58
Barium	7440-39-3	115	0.506	1.00		ICP2-635-58
Cadmium	7440-43-9	94.8	0.405	1.00		ICP2-635-58
Chromium	7440-47-3	106	0.506	1.00		ICP2-635-58
Lead	7439-92-1	96.4	0.506	1.00		ICP2-635-58
Selenium	7782-49-2	97.3	1.01	1.00		ICP2-635-58
Silver	7440-22-4	50.1	0.708	1.00		ICP2-635-58

Analyte Spiked	CAS No.	Sample (mg/kg)	Added (mg/kg)	MS (mg/kg)	MS % Rec.	Q ¹	Limits (%)
Arsenic	7440-38-2	0.853	101	96.5	94.5		75.0-125
Barium	7440-39-3	15.1	101	115	99.0		75.0-125
Cadmium	7440-43-9		101	94.8	93.7		75.0-125
Chromium	7440-47-3	4.93	101	106	100		75.0-125
Lead	7439-92-1	1.58	101	96.4	93.7		75.0-125
Selenium	7782-49-2		101	97.3	96.1		75.0-125
Silver	7440-22-4		50.6	50.1	99.1		75.0-125

¹Qualifier column where "*" denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results
Duplicate Sample
Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56 DUP
Lab Sample ID: 13030305-01D (AQ04235D)

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-57	SW-846 6010B	04/04/2013 15:54	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:01	CJH	0.504 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Arsenic	7440-38-2	ND	0.496	1.00	U	ICP2-635-57
Barium	7440-39-3	14.1	0.496	1.00		ICP2-635-57
Cadmium	7440-43-9	ND	0.397	1.00	U	ICP2-635-57
Chromium	7440-47-3	4.60	0.496	1.00		ICP2-635-57
Lead	7439-92-1	1.39	0.496	1.00		ICP2-635-57
Selenium	7782-49-2	ND	0.992	1.00	U	ICP2-635-57
Silver	7440-22-4	ND	0.695	1.00	U	ICP2-635-57

Analyte	CAS No.	Duplicate (mg/kg)	Precision			Limits (%)
			Sample (mg/kg)	RPD	Q ¹	
Arsenic	7440-38-2	ND	0.853	200		20
Barium	7440-39-3	14.1	15.1	6.86		20
Cadmium	7440-43-9	ND	ND			20
Chromium	7440-47-3	4.60	4.93	6.88		20
Lead	7439-92-1	1.39	1.58	12.6		20
Selenium	7782-49-2	ND	ND			20
Silver	7440-22-4	ND	ND			20

¹Qualifier column where "*" denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results
Duplicate Sample
Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: EARTHJUSTICE FL ASH 12:56 DUP
Lab Sample ID: 13030305-01D (AQ04235D)

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: 100 - Results are based on dry weight unless otherwise noted.

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-57	SW-846 6010B	04/04/2013 15:54	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 14:01	CJH	0.504 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Antimony	7440-36-0	ND	0.496	1.00	U	ICP2-635-57
Molybdenum	7439-98-7	8.28	0.496	1.00		ICP2-635-57
Vanadium	7440-62-2	463	0.496	1.00		ICP2-635-57

Analyte	CAS No.	Duplicate (mg/kg)	Precision			Limits (%)
			Sample (mg/kg)	RPD	Q ¹	
Antimony	7440-36-0	ND	ND			20
Molybdenum	7439-98-7	8.28	8.80	6.05		20
Vanadium	7440-62-2	463	485	4.69		20

¹Qualifier column where '*' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.
PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.

Quality Control Samples (Lab)



**Quality Control Results
Method Blank**

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: Method Blank (AQ04236B)
Lab Sample ID: PBS-34

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	MER1-1270-30	SW-846 7471A	04/02/2013 14:38	CJH	NA	NA	NA
Prep 1:	3586	EPA 7471A	04/01/2013 13:54	CJH	0.395 g	40.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Mercury	7439-97-6	ND	0.0202	1.00	U	MER1-1270-30

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results
Lab Control Sample
Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: Lab Control Sample (AQ04236L)
Lab Sample ID: LCS-34

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	MER1-1270-31	SW-846 7471A	04/02/2013 14:40	CJH	NA	NA	NA
Prep 1:	3586	EPA 7471A	04/01/2013 13:56	CJH	0.407 g	40.0 mL	NA

Analyte Spiked	CAS No.	Added (mg/kg)	LCS (mg/kg)	LCS % Rec.	Q ¹	Limits (%)
Mercury	7439-97-6	15.2	13.4	88.3		71.7-128

¹Qualifier column where "*" denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



**Quality Control Results
Method Blank**

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: Method Blank (AQ04235B)
Lab Sample ID: PBS-35

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-54	SW-846 6010B	04/04/2013 15:47	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 13:55	CJH	0.501 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Antimony	7440-36-0	ND	0.499	1.00	U	ICP2-635-54
Molybdenum	7439-98-7	ND	0.499	1.00	U	ICP2-635-54
Vanadium	7440-62-2	ND	0.499	1.00	U	ICP2-635-54

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



**Quality Control Results
Method Blank**

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: Method Blank (AQ04235B)
Lab Sample ID: PBS-35

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-54	SW-846 6010B	04/04/2013 15:47	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 13:55	CJH	0.501 g	50.0 mL	NA

Analyte	CAS No.	Result (mg/kg)	PQL	Dilution Factor	Flags	File ID
Arsenic	7440-38-2	ND	0.499	1.00	U	ICP2-635-54
Barium	7440-39-3	ND	0.499	1.00	U	ICP2-635-54
Cadmium	7440-43-9	ND	0.400	1.00	U	ICP2-635-54
Chromium	7440-47-3	ND	0.499	1.00	U	ICP2-635-54
Lead	7439-92-1	ND	0.499	1.00	U	ICP2-635-54
Selenium	7782-49-2	ND	0.999	1.00	U	ICP2-635-54
Silver	7440-22-4	ND	0.699	1.00	U	ICP2-635-54

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Quality Control Results
Lab Control Sample
Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: Lab Control Sample (AQ04235L)
Lab Sample ID: LCS-35

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-55	SW-846 6010B	04/04/2013 15:50	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 13:56	CJH	0.504 g	50.0 mL	NA

Analyte Spiked	CAS No.	Added (mg/kg)	LCS (mg/kg)	LCS % Rec.	Q ¹	Limits (%)
Antimony	7440-36-0	120	70.5	58.8		0.00-224
Molybdenum	7439-98-7	88.6	84.8	95.7		76.4-123
Vanadium	7440-62-2	104	101	97.3		75.6-124

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ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



**Quality Control Results
Lab Control Sample**

Job Number: 13030305

Attachment II
Pace Analytical Services, Inc.
2190 Technology Drive
Schenectady, NY 12308
Phone: 518.346.4592
Fax: 518.381.6055

Client: EARTHJUSTICE
Project: EARTHJUSTICE FL ASH
Client Sample ID: Lab Control Sample (AQ04235L)
Lab Sample ID: LCS-35

Collection Date: N/A
Sample Matrix: SOLID
Received Date: N/A
Percent Solid: N/A

	Batch ID	Method	Date	Analyst	Init Wt./Vol.	Final Vol.	Column
Analysis 1:	ICP2-635-55	SW-846 6010B	04/04/2013 15:50	CJH	NA	NA	NA
Prep 1:	3587	EPA 3050B	04/01/2013 13:56	CJH	0.504 g	50.0 mL	NA

Analyte Spiked	CAS No.	Added (mg/kg)	LCS (mg/kg)	LCS % Rec.	Q ¹	Limits (%)
Arsenic	7440-38-2	124	116	93.3		78.0-122
Barium	7440-39-3	316	302	95.4		79.8-120
Cadmium	7440-43-9	116	103	89.1		80.7-119
Chromium	7440-47-3	95.9	94.8	98.8		76.8-123
Lead	7439-92-1	137	127	92.8		77.4-123
Selenium	7782-49-2	202	187	92.6		76.7-123
Silver	7440-22-4	53.5	51.5	96.3		66.4-134

¹Qualifier column where '*' denotes value outside the control limits. Note: RPD criteria does not apply if either the sample and duplicate sample are not detected.

ND: Denotes analyte not detected at a concentration greater than the PQL.

PQL (Practical Quantitation Limit). Denotes lowest analyte concentration reportable for the sample.



Department of Environmental Protection

Attachment III

Waste Program Complaint and Investigation

COMPLAINT INFORMATION

Complaint ID Number: 13-032(see 13-036) Date Received: 03/28/2013 Received By: Durden_B

Site Name: Camp Blanding - North Road County: Clay

Street Address: North Road City: Middleburg

Directions:

Site Contact: Camp Blanding Environmental Site Contact Phone Number: n/a

Complainant Name: Scott Allen Complainant Phone Number: (904) 553-8344

Description of the Complaint:

Complainant Requests Follow-Up: ☒ Yes ☐ No

EZBase applied adjacent to residential property. Concerned about dust and run-off contaminating the pond and property. EZBase road is within inches of his property.

db

ROUTING:

PA Initials: MF

Referred To: SW

Date: 4/5/2013

Please Handle: ASAP

30 Days 60 Days

90 Days

Section Supervisor Initials: BD

Referred To:

Date:

Please Handle: ASAP

X 30 Days 60 Days

90 Days

RESULT:

☐ No Concerns ☐ HW ☐ TK ☐ SW ☐ WCU ☒ Potential Concerns ☐ HW ☐ TK ☒ SW ☐ WCU

☐ Concerns ☐ HW ☐ TK ☐ SW ☐ WCU

Inspection By: Brian Inspection Dates: 4/4/2013 Inspector Notified Clerical of Insp.: Yes ☐ Date:

Inspection Results:

a portion of the EZ Base road not installed in accordance with the DEP EZ Base beneficial used guidance document

Potential Other Program or Agency Concerns ☐ Yes ☐ No Referred To: Date:

Comments:

email on 4/8/13 indicating issue has been corrected

Comments:

Complaint not Valid: ☐

Follow Up With Complainant: Yes ☒ No ☐

Date: 4/8/2013

Complaint Closed Date: 4/8/2013

Resolved: ☒

Enforcement Initiated: ☐

Jacksonville Electric Authority
EZBase Beneficial Use Demonstration Records

Attachment IV

Year	Quarter	Dates	Property Owner	Project Name	Address	County	Parcel #	Parcel #	Tonnage	Use
2011	2	4/1-6/3	Rayonier	Ford Road	due west of interesection of 301/Ford Rd. Bryceville	Nassau	06-1S-24-0000-0001-0000	05-1S-24-0000-0008-0000	6,759	secondary road, uncovered
2011	2	4/1-6/3	Rayonier	CR 119 T-Line	on CR 119, 1/2 mile west of CR 119 and SR 301 intersection	Nassau	19-1S-24-0000-0002-0000	24-1S-23-0000-0001-0000	16,678	secondary road, uncovered
2011	2	4/1-6/3	Clay County Port Inc.	Clay County Port Boat Storage Phase III	Reynolds Industrial Park, Leonard C Taylor Pkwy., Green Cove Springs	Clay	38-06-26-016453-000-00		1663	laydown area, uncovered
2011	2	4/1-6/3	Baker Bounty	Glen St Mary	Glen Nursery Road, Glen St. Mary, FL	Baker	02-3S-21-0000-0000-0040	01-3S-21-0000-0000-0080	1,215	base, reworking road
2011	2	4/1-6/3	Ed Witt	Haller Airpark	Airpark Loop West, Green Cove Springs	Clay	10-07-26-015830-001-00		756	base, covered road
2011	2	4/1-6/4	JEA	Greenland Energy Center	Energy Center Drive, Jacksonville, FL	Duval	168060-0200		1,082	base, covered road
2011	3	7/1-9/30	Rayonier	CR 119 T-Line	on CR 119, 1/2 mile west of CR 119 and SR 301 intersection	Nassau	19-1S-24-0000-0002-0000	24-1S-23-0000-0001-0000	4,908	secondary road, uncovered
2011	3	7/1-9/30	Rayonier	Loop Road	off CR 119 and tline interesection, 1/2 mile down tline on left	Nassau	19-1S-24-0000-0002-0001	18-1S-24-0000-0001-0000	30,312	secondary road, uncovered
2011	3	7/1-9/30	Rayonier	RD 135/100 West	off CR 119 and tline interesection, 2/3 mile down tline on left	Nassau	13-1S-23-0000-0002-0000	24-1S-23-0000-0001-0000	15,997	secondary road, uncovered
2011	3	7/1-9/30	Rayonier	RD 315 and 317	one mile west of the intersection of Hambone Dr. and SR 301	Nassau	32-1N-25-0000-0001-0000		20,404	secondary road, uncovered
2011	3	7/1-9/30	Camp Blanding	Black Creek Road	Camp Blanding North of 16. Take Woodberry off CR 225 to Black Creek Rd. (head North)		22-05-23-000568-003-00	27-05-23-000568-008-00	18,167	secondary road

Jacksonville Electric Authority
EZBase Beneficial Use Demonstration Records

Attachment IV

Year	Quarter	Dates	Property Owner	Project Name	Address	County	Parcel #	Parcel #	Tonnage	Use
2011	3	7/1-9/30	Camp Blanding	Detention Facility	Camp Blanding North of 16. Take Woodberry off CR 225 & turn South on Detention Rd.		09-06-23-000569-008-00		2,724	secondary road
2011	3	7/1-9/30	Camp Blanding	North Cross Creek Road	Camp Blanding North of 16. Take Woodberry off CR 225 to Cross Creek Rd. Starts 1.5 miles North		21-05-23-000568-002-00	29-05-000568-010-00	3,996	secondary road, uncovered
2011	3	7/1-9/30	Camp Blanding	South Bay	Camp Blanding North of 16. Take Woodberry off CR 225 to Black Creek Rd. head North to South Bay (turn left)		34-05-23-000568-015-00		871	secondary road, uncovered
2011	4	10/1-12/31	Rayonier	CR 119 T-Line	on CR 119, 1/2 mile west of CR 119 and SR 301 intersection	Nassau	19-1S-24-0000-0002-0000	24-1S-23-0000-0001-0000	1,736	secondary road, uncovered
2011	4	10/1-12/31	Rayonier	RD 135/100 West	off CR 119 and tline interesction, 2/3 mile down tline on left	Nassau	13-1S-23-0000-0002-0000	24-1S-23-0000-0001-0000	31,413	secondary road, uncovered
2011	4	10/1-12/31	Rayonier	RD 100- Power Lines	off CR 119 and tline interesction, 2/3 mile down tline on left	Nassau	13-1S-23-0000-0002-0000	11-1S-23-0000-0001-0000	10,751	secondary road, uncovered
2011	4	10/1-12/31	Dupont	Dupont/ CR 228	off CR 228 half a mile south of the CR 228 and I10 intersection	Baker	03-3S-22-0000-0000-0010		16,174	secondary road, uncovered
2011	4	10/1-12/31	Camp Blanding	North Cross Creek Road	Camp Blanding North of 16. Take Woodberry off CR 225 to Cross Creek Rd. Starts 1.5 miles North	Clay	21-05-23-000568-002-00	29-05-23-000568-010-00	8,202	secondary road, uncovered
2011	4	10/1-12/31	Camp Blanding	East Fence Road	Camp Blanding North of 16. Take Woodberry off CR 225 to East Fence Road	Clay	06-06-24-006813-000-00	31-05-24-006739-000-00	1,907	secondary road, uncovered

Jacksonville Electric Authority
EZBase Beneficial Use Demonstration Records

Attachment IV

Year	Quarter	Dates	Property Owner	Project Name	Address	County	Parcel #	Parcel #	Tonnage	Use
2012	1	1/1-3/31	Rayonier and Stokesville FL Land	Pasture Road	off CR 119 and US 301. 2 miles down on the right	Nassau	22-1S-23-0000-0001-0000	15-1S-23-0000-0001-0030	23,992	secondary road, uncovered
2012	1	1/1-3/31	Rayonier	RD 100- Power Lines	off CR 119 and tline interesction, 2/3 mile down tline on left	Nassau	13-1S-23-0000-0002-0000	11-1S-23-0000-0001-0000	25,310	secondary road, uncovered
2012	1	1/1-3/31	Haller Airpark	Airpark Loop West	Airpark Loop West, Green Cove Springs (off SR 17 South)	Clay	10-07-26-015830-001-00		1,834	secondary road, uncovered
2012	1	1/1-3/31	Camp Blanding	Impact Road	CB off SR 21 about 7 miles south of the SR 16 and SR 21 intersection	Clay	24-07-23-000736-003-00	23-07-23-000736-002-00	2,993	secondary road, uncovered
2012	1	1/1-3/31	Camp Blanding	Range Line Road	CB off CR 215 one mile north of the CR 215 and SR 16 intersection	Clay	01-06-23-000569-000-00	36-05-23-000568-017-00	2,720	secondary road, uncovered
2012	1	1/1-3/31	Camp Blanding	San Juan Road	CB off SR 21 about 6.5 miles south of the SR 16 and SR 21 intersection	Clay	18-07-24-006906-000-00		3,546	secondary road
2012	2	4/1-6/30	Rayonier	CR 121 and Stokes Rd	off CR 121 and Stokes Rd.		29-1S-23-0000-0003-0000	29-1S-23-0000-0008-0000	1,934	secondary road, uncovered
2012	2	4/1-6/30	Clay County Port Inc.	Clay County Port Boat Stoorage Phase IV	Reynolds Industrial Park, Leonard C Taylor Pkwy., Green Cove Springs	Clay	38-06-26-016453-000-00		2,070	uncovered
2012	3	7/1-9/30	Rayonier	CR 121 and Stokes Rd	off DR 121 500 feet south of the CR 121 and Stokes Road intersection		29-1S-23-0000-0003-0000	29-1S-23-0000-0008-0000	11,204	secondary road, uncovered
2012	3	7/1-9/30	Rayonier	River Road	South off River Road between CR 121 and Foxhound Trail		29-2N-24-0000-0002-0000		1,083	secondary road, uncovered

Jacksonville Electric Authority
EZBase Beneficial Use Demonstration Records

Attachment IV

Year	Quarter	Dates	Property Owner	Project Name	Address	County	Parcel #	Parcel #	Tonnage	Use
2012	4	10/1-12-31	Clay County Port Inc.	Clay County Port Boat Stoorage Phase V	Reynolds Industrial Park, Leonard C Taylor Pkwy., Green Cove Springs	Clay	38-06-26-016453-000-00		1,966	uncovered